



FLORIDA STATE CONFERENCE NAACP  
NATIONAL ASSOCIATION FOR THE ADVANCEMENT OF COLORED PEOPLE

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June 20, 2011

Honorable Julius Genachowski  
Federal Communications Commission  
445 12th Street SW  
Washington, D.C. 20554

Dear Chairman Genachowski:

The Florida State Conference of the National Association for the Advancement of Colored People (NAACP) joins the national NAACP in supporting the proposed AT&T - T-Mobile merger. We do so to ensure that more African Americans in Florida can secure equality and equal access in the economic, social, and political realms. Many African Americans in our state currently lack access to wireless and mobile broadband services and we see this merger as a significant step toward remedying this situation.

In October 2009, the National NAACP Board of Directors, unanimously approving a Resolution offered by the Florida State Conference, declared:

The NAACP will champion community-based programs and partnerships between local governments and private enterprises which will spur the adoption and use of broadband and advanced communications technologies by members of underserved populations.... The NAACP recognizes that broadband provides a vital engine of opportunity that can be leveraged to empower those who suffer socio-economic disadvantages caused by disparities in education, job training, access to credit and financial services, and availability and provision of healthcare services.

It is specifically because the AT&T - T-Mobile merger will serve as this "vital engine of opportunity" that we believe it is in the interest of African Americans across Florida that the merger be approved. The benefits of the merger include improved wireless and 4G LTE broadband service, which is essential for economic and civic engagement within the African American community. Although NTIA reports that only 49% of African Americans have adopted home broadband compared to 69% of whites, African Americans have enthusiastically adopted wireless for their communication needs—87% of African Americans own cellular devices and 64% use wireless services. Moreover, of those who own cell phones, minorities are highly likely to own smartphone devices. These numbers demonstrate that African Americans rely on wireless and mobile broadband services more than their majority counterparts.

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Currently our wireless infrastructure is challenged by access issues. These issues are especially critical in Florida, the fourth largest and one of the fastest growing states, and home to five large metropolitan areas that face wireless data capacity concerns. The Commission has predicted that demand will soon eclipse spectrum availability, and has recommended that an additional 300 MHz be dedicated to wireless within five years and 500 MHz of broadband spectrum by 2020. Inner city and rural Americans have not truly witnessed the benefits of broadband, and often must contend with slower connection speeds. To address this, AT&T has pledged to expand its wireless infrastructure to bring 4G service to 97% of Americans over the coming years. In that way, states like Florida can close the coverage gap and will be able to receive the state-of-the-art service that we'll need in order to bridge the digital divide.

The Florida State Conference of the NAACP has long recognized AT&T as a leader in providing economic opportunities to African Americans. Through its committed hiring, procurement, and philanthropic work, AT&T has successfully reached our communities of color and helped them strive for equality and prosperity at all levels. *Diversity Magazine*, *Black Enterprises*, and *Fortune* have all recognized AT&T for hiring, training, and promoting minority workers. AT&T has also excelled in the company's treatment of its workforce by giving employees the option of joining the Communication Workers of America (CWA) union. Giving employees a choice in unionization empowers them to obtain greater economic benefits, and enables greater equality in the workplace.

AT&T and its subsidiaries have been strong partners with minority enterprises. Their procurement process pays attention to expanding contracting and supply chain opportunities for minority businesses. Expanding the 4G wireless network is one of the ways the merger will create business opportunities for African Americans, particularly in light of AT&T's outstanding, 40-year record of supporting diversity through contracting.

AT&T has also been a leader in philanthropy, with considerable resources dedicated to communities of color. The corporate social responsibility AT&T has delivered is a model of civic and community engagement. We believe that by imparting digital citizenship to all people, we can better educate future generations, close the achievement gap, make healthcare more accessible and affordable for the millions of Americans who lack access to essential medical services, provide new job opportunities, and much more.

For these reasons, we see the proposed AT&T and T-Mobile merger as a step in the right direction and one that shows much promise in serving the public interest of communities of color in Florida. Wireless and mobile broadband service is essential to closing our nation's digital divide. AT&T has been a valued partner to the African American community, and its acquisition of T-Mobile will better serve minorities in wireless voice and data service provision, job creation, and community engagement. We strongly recommend that the voice of African Americans in Florida be recognized and that approval of this merger serve as a step in achieving a brighter future for all communities of color.

Sincerely,



Adora Obi Nweze

President

Florida State Conference of the NAACP

cc: Hon. Michael Copps  
Hon. Robert McDowell  
Hon. Mignon Clyburn